



# Metropolitan Telecommunications

## OSS Analysis Issues

### New Jersey 271 Re-Filing (W.C. 02-67)

**Note: This presentation is Redacted for Public  
Distribution**

# Overview

- Effective competition is predicated on operational viability.
- A strong, open and reliable Operational Support System (OSS) is essential for open competition.
- Verizon's New Jersey systems are not effectively operationally viable.
- Ineffective systems are barriers to competition.
- Absent effective systems, 271 approval must be denied.

# MetTel Issues

- Timely Provision of Local Service Request Confirmations (LSRCs) and Rejects as well as timely return of Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs) is an essential component of a strong, open and reliable OSS.
- Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs) is another essential component of a strong, open and reliable OSS.

## Timeliness Metrics Issues

- Metrics Performance Analysis using “Flat File” data confirms MetTel’s earlier results.
- MetTel’s calculation of the performance metrics indicate Verizon failed \*\* sub-metrics for the November through March period.

## Timeliness Metrics Issues

- Verizon's MetTel specific results indicate they failed \*\* of these sub-metrics.
- On a statewide basis, Verizon stated they failed 2 sub-metrics.
- Thus, even using Verizon's own numbers MetTel received discriminatorily sub par service.

# Timeliness Metrics Issues

## Summary Chart I

### NJ OR 1 & 2 Metrics Performance

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200111	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					1413	99.50%
200111	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1242	97.58%
200111	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					290	100.00%
200111	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					627	98.72%
200111	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					1430	98.88%
200111	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					171	100.00%
200111	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					18209	96.88%
200111	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3917	97.98%
200111	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					305	99.67%
200111	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2799	98.36%
200111	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					2603	99.23%
200111	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					287	99.65%
200112	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					1801	99.44%
200112	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1320	98.64%
200112	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					276	99.64%
200112	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					549	100.00%
200112	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					1395	99.00%
200112	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					146	100.00%
200112	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					15591	99.33%
200112	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3553	98.17%
200112	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					318	98.74%
200112	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2168	99.72%
200112	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1853	98.92%
200112	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					261	110.00%

# Timeliness Metrics Issues

## Summary Chart II

### *NJ OR 1 & 2 Metrics Performance*

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200201	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					2002	100.00%
200201	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1580	98.16%
200201	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					458	100.00%
200201	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					696	100.00%
200201	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					1631	98.71%
200201	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					290	99.66%
200201	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					21554	99.99%
200201	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					4033	98.59%
200201	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					387	99.74%
200201	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2724	99.93%
200201	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1998	99.45%
200201	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					361	100.00%
200202	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					1838	99.56%
200202	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1218	98.03%
200202	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					324	100.00%
200202	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					525	98.10%
200202	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					831	98.68%
200202	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					140	100.00%
200202	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					16245	99.47%
200202	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3681	98.40%
200202	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					290	99.66%
200202	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2434	99.55%
200202	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1759	99.66%
200202	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					308	99.68%

# Timeliness Metrics Issues Summary Chart III

## NJ OR 1 & 2 Metrics Performance

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200203	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2					2031	99.80%
200203	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24					1235	98.14%
200203	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72					290	99.66%
200203	NJ	UNE	OR-2-02	OT Reject FlowThrough	2					597	99.16%
200203	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24					943	99.26%
200203	NJ	UNE	OR-2-06	OT Reject FC - POTS	72					170	100.00%
200203	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2					17830	98.48%
200203	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24					3903	99.18%
200203	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72					409	99.78%
200203	NJ	Resale	OR-2-02	OT Reject FlowThrough	2					2472	99.56%
200203	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24					1739	99.65%
200203	NJ	Resale	OR-2-06	OT Reject FC - POTS	72					251	100.00%



## Timeliness Metrics Issues

- As part of its reconciliation, MetTel noted the following major issues which caused discrepancies between the two results:
  - Situations where multiple copies of the same notifier were received and MetTel counted the 1<sup>st</sup> while Verizon counted a subsequent transmission in a different month.
  - Situations where both a FOC and a Query were received and Verizon only counted the FOC
  - Verizon counted a different notifier in lieu of the one not received.
  - Project PONs were incorrectly included or excluded.

# Timeliness Metrics Issues

## Summary Chart IV

### NJ Metric OR-1/OR-2 Reconciliation

Month	Metric	EDI PON / Version calculated by MetTel but not included in VZ Calculation					WEB GUI	PON / Version appears on VZ Flat File but not calculated by MetTel					Total Difference
		Multiple Notifiers - MetTel counted the earliest	Notifier received in different period than reported by VZ	VZ did not calculate/ calculated wrong notifier	The PON received query and FOC, VZ calculated the FOC only	Total	WEB GUI PONs	PON/ Version never been sent	Notifier not received/ Different notifier received	Notifier received in different period than reported by VZ	Project PON	Total	

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# Timeliness Metrics Issues Summary Chart V

## NJ Metric OR-1/OR-2 Reconciliation

Month	Metric	EDI PON / Version calculated by MetTel but not included in VZ Calculation					WEB GUI	PON / Version appears on VZ Flat File but not calculated by MetTel					Total Difference
		Multiple Notifiers - MetTel counted the earliest	Notifier received in different period than reported by VZ	VZ did not calculate/ calculated wrong notifier	The PON received query and FOC, VZ calculated the FOC only	Total	WEB GUI PONs	PON/ Version never been sent	Notifier not received/ Different notifier received	Notifier received in different period than reported by VZ	Project PON	Total	

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# Timeliness Metrics Issues

## Summary Chart VI

### NJ OR-4 Metrics Performance

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Observations	MetTel Calculated % Achieved	Verizon Observations for MetTel	Verizon Calculated% Achieved for MetTel	Verizon Industry Aggregate Observations	Verizon Calculated Industry Aggregate % Achieved
200111	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					5952	100.00%
200111	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					1806	94.52%
200111	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					20670	99.91%
200111	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					11896	99.39%
200112	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					6797	100.00%
200112	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					3112	97.94%
200112	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					17881	100.00%
200112	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					10312	99.35%
200201	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					9505	100.00%
200201	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					5336	91.12%
200201	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					22772	100.00%
200201	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					10234	99.22%
200202	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					5478	100.00%
200202	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					1467	95.43%
200202	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					17923	99.92%
200202	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					9640	98.98%
200203	NJ	UNE	OR-4-05	Work Completion Notice % OT	12N Next BD					5935	100.00%
200203	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					1576	91.88%
200203	NJ	Resale	OR-4-05	Work Completion Notice % OT	12N Next BD					21669	100.00%
200203	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3 Days					12343	99.13%

## **Timeliness Metrics Issues**

- MetTel has noted differences between months for the date reported as the SOP Notification Date and the actual Completion Date on the PCN.
- MetTel has also noticed that project PONs were not included in accordance with the actual project agreement.
- MetTel could not replicate the number of PONs on the Flat File meeting the selection criteria with the number of PONs on the Verizon Performance Reports.



# Timeliness Metrics Issues Summary Chart VII

## NJ Metric OR-4 Reconciliation

<i>Month</i>	<i>Metric</i>	EDI PON / Version calculated by MetTel but not included in VZ Calculation				<i>WEBGUI</i>	PON / Version appears on VZ Flat File but not calculated by MetTel		<i>Total Difference</i>
		<i>Verizon Flat File / Monthly Report do not match</i>	<i>SOP Notification Date is in a different period than PCN CD</i>	<i>VZ did not include PONs improperly</i>	<i>Total</i>		<i>SOP Notification Date is in a different period than PCN CD</i>	<i>Total</i>	

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## Timeliness Metrics Issues

- MetTel has utilized both the specific language of the New Jersey metrics and the Verizon published calculation rules to produce as congruent results as possible.
- MetTel is forwarding our calculations to Verizon along with our reconciliations.



## **Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- The notifiers transmitted by Verizon certify the work requested has been completed, analysis of the expected results indicates this is not the case.
- CLECs have no other information source as an alternative to the Verizon notifiers and must rely upon them.





## **Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- MetTel examines usage based on the Usage Record Date i.e. the date the End User incurred the usage (i.e Date of Record) as presented on the Verizon Daily Usage File.
  - This usage is utilized to verify the validity of the completion notifier by testing for the expected result.
- Since the cessation of Usage is easier to verify than the commencement, MetTel has met with Verizon over Usage after SNP and before Restoral.



## **Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- As noted in MetTel's April 25 Filing, for the period of January through March 2002:
  - \*\*% of MetTel Suspensions for Non Payment (SNP) were not completed as per the BCN (\*.\*\*% showed usage after the suspension completion date and before the restoral completion date and \*.\*\*% showed continued usage with no restoral of service.



## **Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- MetTel has engaged in several meetings with Verizon to examine these items:
  - MetTel has reconciled the appearance of some lines on several Loss of Line Reports with different effective dates on each report and noted that the average time usage appears before the winback is \* days rather than the \* day Verizon stated that they had to restore prior to a winback.
  - Centrex Blocking (used instead of Suspension for non Payment) has not been clearly documented with clarification only received on 5/9/02 and Verizon has stated there is no way to suspend any Assumed Dial 9 Centrex.



## **Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- 50% of the issues Verizon identified relate to a block which was not identified in the business rules as non applicable until 5/9/02.
- 100% of the questioned PONs were Confirmed, Provisioned and Billing Completed.
- If the blocks were not appropriate or allowed, why were they not queried as others were?
- Verizon notifiers (LSRCs, PCNs & BCNs) are primary CLEC information source documents which must be unfailingly accurate.



## **Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- If the inappropriateness was missed by the OSS, then there is a systemic error which indicates the system is less than 271 ready.
- If the inappropriate Confirmations were issued by Verizon Reps, then there is a quality of operations issue which needs to be resolved prior to 271.
- If inappropriate PCNs and BCNs were issued due to Rep error, then there is a major systems/operational issue which needs rectification prior to 271.



## **Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- Likewise, MetTel has also noticed problems when customers request a change in their Long Distance Carrier.
- As reflected by the chart, this performance is deteriorating over time.



# Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs: Summary Chart I

## CIC Change Accuracy - Monthly Summary

State	January		February		March		Total	
	First Call Not As Requested	Total Calls Routed to Different CIC	First Call Not As Requested	Total Calls Routed to Different CIC	First Call Not As Requested	Total Calls Routed to Different CIC	First Call Not As Requested	Total Calls Routed to Different CIC

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## **Residual Issues**

- This presentation has focused on the open issues remaining from the April 12 Ex Parte.
- The issues previously addressed pertaining to such categories as absence of appropriate usage, usage after disconnection and Trouble Tickets persist.



# Conclusion

- MetTel's analyses demonstrate that Verizon's OSS requires remediation before it is adequate for open and free competition.